

JUDGE RAMOS

13 CIV 8236

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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PEARSON EDUCATION, INC., :
JOHN WILEY & SONS, INC., :
CENGAGE LEARNING, INC, AND :
MCGRAW-HILL GLOBAL EDUCATION :
HOLDINGS, LLC, :

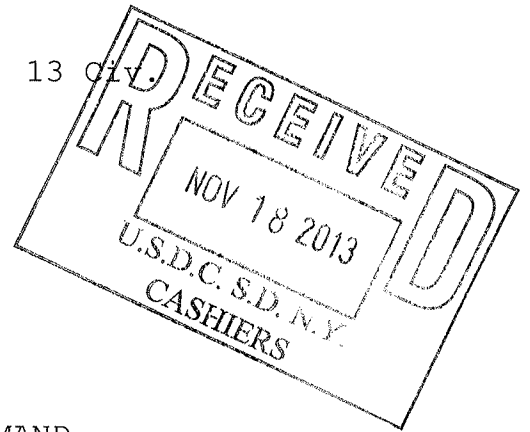
Plaintiffs, :

-against- :

JOHN DOE D/B/A CANDYEBOOKS.COM :
D/B/A CANDYEBOOKS AND JOHN DOE :
NOS. 1-5, :

Defendants. :

- - - - -x



COMPLAINT AND JURY DEMAND

Plaintiffs Pearson Education, Inc. ("Pearson"), John Wiley & Sons, Inc. ("Wiley"), Cengage Learning, Inc. ("Cengage") and McGraw-Hill Global Education Holdings, LLC ("MHE"), by their undersigned attorneys, for their complaint against defendants John Doe d/b/a CandyEbooks.com d/b/a CandyEbooks and John Doe Nos. 1-5, aver:

Nature of the Action

1. Plaintiffs publish college textbooks and corresponding instructors' solutions manuals and test banks. Plaintiffs are bringing this action to obtain legal and equitable relief to remedy defendants' infringement of plaintiffs' copyrights and trademarks through their sales of unauthorized

electronic copies of textbooks ("e-books"), instructors' solutions manuals and test banks.

Jurisdiction and Venue

2. This Court has subject matter jurisdiction over the first three claims for relief in this action pursuant to 28 U.S.C. §§ 1331 and 1338 because they arise under the Copyright Act, 17 U.S.C. § 101 et seq. or the Lanham Act, 15 U.S.C. § 1051 et seq. The Court has subject matter jurisdiction over the fourth claim for relief under 28 U.S.C. § 1367 because it is so related to the claims within the original jurisdiction of the Court that they form the same case or controversy under Article III of the United States Constitution.

3. Upon information and belief, venue is proper in this District pursuant to 28 U.S.C. §§ 1391 and 1400(a).

Parties

4. Pearson is a corporation organized and existing under the laws of the State of Delaware with its principal place of business at One Lake Street, Upper Saddle River, New Jersey 07458.

5. Wiley is a corporation organized and existing under the laws of the State of New York with its principal place of business at 111 River Street, Hoboken, New Jersey 07030.

6. Cengage is a corporation organized and existing under the laws of the State of Delaware with its principal place

of business at 200 First Stamford Place, 4th Floor, Stamford, Connecticut 06902.

7. MHE is a limited liability company organized and existing under the laws of the State of Delaware with its place of business at 2 Penn Plaza, New York, New York 10121-2298.

8. Upon information and belief, defendant John Doe d/b/a CandyEbooks.com d/b/a CandyEbooks is a natural person currently residing in the United States whose identity and location is currently unknown to plaintiffs.

9. Upon information and belief, defendants John Doe Nos. 1-5 are natural persons currently residing in the United States whose identities are presently unknown to plaintiffs.

The Businesses of Plaintiffs

10. Each plaintiff publishes a variety of works, including educational books.

11. As a standard practice, each plaintiff requires its authors to assign the copyrights to it or grant it the exclusive rights of reproduction and distribution in the United States. This practice enables each plaintiff to maximize the dissemination of each work.

12. Plaintiffs invest significant monies to publish their copyrighted works. Plaintiffs, for example, make substantial investments in royalties, content creation, licensing, copyediting, proofreading, typesetting, layout,

printing, binding, distribution, copyright enforcement, trademark enforcement and promotion.

13. Plaintiffs earn a substantial portion of their revenue from the publication of their copyrighted works and would suffer serious financial injury if their copyrights were not enforced. A substantial decline in their income could cause plaintiffs to cease publishing one or more deserving books or journals. This would adversely impact the creation of new works, scholarly endeavor, and scientific progress.

14. An important part of plaintiffs' business is derived from publishing college textbooks. College professors select textbooks from competing publishers based on the pedagogical value and the quality of the materials. The plaintiffs would suffer injury to their reputations and good-will in the marketplace if their trademarks were not enforced.

15. Instructors' solutions manuals and test banks are important supplementary materials. Professors use instructors' solutions manuals and test banks to aid in grading homework and tests. Students, however, use instructors' solutions manuals and test banks to cheat. Professors are less likely to select a textbook if the instructors' solutions manuals or test banks are freely and/or widely available. Accordingly, plaintiffs do not sell their instructors' solutions manuals or test banks, and tightly control their distribution to known faculty.

Plaintiffs' Copyrights and Trademarks

16. Plaintiffs routinely register their copyrights. Pearson has generally registered its copyrights in its works, including the works on Schedule A (the "Pearson Copyrights"). Wiley has generally registered its copyrights in its works, including the works on Schedule B (the "Wiley Copyrights"). Cengage has generally registered its copyrights in its works, including the works on Schedule C (the "Cengage Copyrights"). MHE has generally registered its copyrights in its works, including the works on Schedule D (the "MHE Copyrights").

17. Plaintiffs also own, themselves or through their parent or affiliate companies, trademarks that they use to differentiate their products from those of their competitors.

18. Among Pearson's well-known trademarks are "Pearson," "Pearson Education" and "Prentice Hall." Pearson is the direct holder of the well-known trademark "Benjamin Cummings." Pearson's affiliate corporation Addison Wesley Longman, Inc., is the owner of, and Pearson is the exclusive licensee of, with the accompanying right and duty to protect and enforce its and its affiliate company's rights therein, the well-known trademarks "Addison Wesley" or "Addison-Wesley" (the "Pearson Trademarks"). The United States Registrations for the Pearson Trademarks are identified on Schedule E.

19. Among Wiley's well-known trademarks are "John Wiley & Sons," "Wiley," and the "John Wiley Colophon" (the "Wiley Trademarks"). The United States Registrations for the Wiley Trademarks are identified on Schedule F.

20. Among Cengage's well-known trademarks are "Cengage" and "Cengage Learning" (the "Cengage Trademarks"). The United States Registrations for the Cengage Trademarks are identified on Schedule G.

21. Among MHE's well-known trademarks are "McGraw-Hill," and "Irwin" (the "MHE Trademarks"). The United States Registrations for the MHE Trademarks are identified on Schedule H.

The Infringing Acts of Defendants

22. Defendants have, without permission, reproduced and sold copies of plaintiffs' works bearing plaintiffs' marks, or confusingly similar marks. Specifically, the defendants have reproduced and sold e-book copies of plaintiffs' textbooks, instructors' solutions manuals and test banks, including sales into the Southern District of New York, through online sales at websites and forums, including but not limited to, CandyEbooks.com, using the usernames, including but not limited to, "CandyEbooks.com" and "CandyEbooks," and e-mail addresses including, but not limited to, boymv18@yahoo.com, and provided the following false information to the domain name registrar

eNom, Inc.: "John White, 90 Harrison Place, Montac, AK, (345) 982-9921."

FIRST CLAIM FOR RELIEF
(Copyright Infringement - 17 U.S.C. § 501)

23. Plaintiffs repeat the averments contained in paragraphs 1 through 22 as if set forth in full.

24. Pearson has received United States Certificates of Copyright Registration for the Pearson Copyrights.

25. Wiley has received United States Certificates of Copyright Registration for the Wiley Copyrights.

26. Cengage has received United States Certificates of Copyright Registration for the Cengage Copyrights.

27. MHE has received United States Certificates of Copyright Registration for the MHE Copyrights.

28. The Pearson, Wiley, Cengage and MHE Copyrights are valid and enforceable.

29. Defendants have infringed the Pearson, Wiley, Cengage and MHE Copyrights in violation of 17 U.S.C. § 501.

30. Defendants' acts have irreparably damaged and, unless enjoined, will continue to irreparably damage plaintiffs. Plaintiffs have no adequate remedy at law for these wrongs and injuries. Plaintiffs are, therefore, entitled to a preliminary and permanent injunction restraining and enjoining defendants and their agents, servants, employees, and attorneys and all persons

acting in concert with them, from infringing the Pearson, Wiley, Cengage and MHE Copyrights.

31. Defendants have willfully infringed the Pearson, Wiley, Cengage and MHE Copyrights, evidence of which includes, but is not limited to, providing false information to a domain name registrar in violation of 17 U.S.C. § 504(c)(3).

32. Plaintiffs are entitled to recover all damages sustained as a result of defendants' unlawful conduct including (1) defendants' profits, or (2) plaintiffs' damages, or alternatively at plaintiffs' election, (3) statutory damages.

SECOND CLAIM FOR RELIEF

(Trademark Infringement - 15 U.S.C. § 1114(a))

33. Plaintiffs repeat the averments contained in paragraphs 1 through 32 above as if set forth in full.

34. Pearson is the exclusive licensee of the Pearson Trademarks, with the accompanying right and duty to protect and enforce Pearson's rights therein. Pearson's licensor parent and affiliate companies have obtained United States Trademark Registrations for the Pearson Trademarks.

35. Wiley owns the Wiley Trademarks, for which it has obtained United States Trademark Registrations.

36. Cengage owns the Cengage Trademarks, for which it has obtained United States Trademark Registrations.

37. MHE owns the MHE Trademarks, for which it has obtained United States Trademark Registrations.

38. The Pearson, Wiley, Cengage and MHE Trademarks are valid and enforceable.

39. Defendants have infringed the Pearson, Wiley, Cengage and MHE Trademarks in violation of 15 U.S.C. § 1114(a) by using them on and/or in connection with the works that they have sold.

40. Defendants' acts complained of herein have irreparably damaged plaintiffs and may continue to do so. The damage to plaintiffs includes harm to their good will and reputation in the marketplace for which money cannot compensate. Plaintiffs have no adequate remedy at law for these wrongs. Plaintiffs are, therefore, entitled to a preliminary and permanent injunction restraining and enjoining defendants, their agents, servants, employees, and attorneys and all persons acting in concert with them from using the Pearson, Wiley, Cengage and MHE Trademarks, or any colorable imitation of them.

41. Defendants have willfully infringed the Pearson, Wiley, Cengage and MHE Trademarks.

42. Plaintiffs are entitled to recover (1) defendants' profits from the infringing books, (2) plaintiffs' damages, (3) the costs of the suit, and (4) reasonable attorneys' fees.

THIRD CLAIM FOR RELIEF

(Trademark Counterfeiting - 15 U.S.C. § 1117)

43. Plaintiffs repeat the averments in paragraphs 1 through 42 above as if set forth in full.

44. In connection with the sale of their pirated e-books, defendants have used counterfeits of the Pearson, Wiley, Cengage and MHE Trademarks.

45. Based upon defendants' use of counterfeits of the Pearson, Wiley, Cengage and MHE Trademarks in connection with their sales of pirated e-books, plaintiffs are entitled to recover treble damages, treble profits, and/or statutory damages, pursuant to 15 U.S.C. § 1117(b) and (c).

FOURTH CLAIM FOR RELIEF

(Common Law Unfair Competition Under State Law)

46. Plaintiffs repeat the averments contained in paragraphs 1 through 45 above as if set forth in full.

47. Defendants' acts complained of herein have damaged and may continue to damage plaintiffs irreparably. The damage to plaintiffs includes harm to their good will and reputation in the marketplace for which money cannot compensate. Plaintiffs have no adequate remedy at law for these wrongs and injuries.

Plaintiffs are, therefore, entitled to a preliminary and permanent injunction restraining and enjoining defendants, their agents, servants, employees, and attorneys and all persons acting in concert with them from using the Pearson, Wiley, Cengage and

MHE Trademarks, or any colorable imitation of them, to restitution of defendants' ill-gotten gains, and to punitive damages in an amount to be determined by the trier of fact in this action.

WHEREFORE, plaintiffs demand judgment:

A. Preliminarily and permanently enjoining defendants, their agents, servants, employees, and attorneys and all those acting in concert with them from infringing the Pearson, Wiley, Cengage and MHE Copyrights in violation of 17 U.S.C. § 501;

B. Awarding plaintiffs their damages or defendants' profits, or alternatively, at plaintiffs' election, statutory damages, as a result of defendants' willful infringement of the Pearson, Wiley, Cengage and MHE Copyrights;

C. Preliminarily and permanently enjoining defendants, their agents, servants, employees, and attorneys and all those acting in concert with them from infringing the Pearson, Wiley, Cengage and MHE Trademarks in violation of 15 U.S.C. § 1114(a);

D. Transferring to plaintiffs, or alternatively, cancelling, the domain name www.candyebbooks.com;

E. Awarding plaintiffs their damages and/or defendants' profits from their willful infringement of the Pearson, Wiley, Cengage and MHE Trademarks pursuant to 15 U.S.C.

§ 1117(a);

F. Directing that defendants engage in such additional activities, including, but not limited to, recalls of products and corrective advertising, as may be necessary and appropriate to mitigate the damage defendants have caused;

G. Awarding plaintiffs their costs in this action, including their reasonable attorneys' fees pursuant 17 U.S.C. § 505 and 15 U.S.C. § 1117;

H. Awarding plaintiffs punitive damages in an amount to be determined by the trier of fact in this action; and

I. Granting such other and further relief as to this Court seems just and proper.

Jury Trial Demand

PLEASE TAKE NOTICE that pursuant to Rule 38 of the Federal Rules of Civil Procedure, the plaintiffs hereby demand a

trial by jury of all issues that are so triable.

Dated: New York, New York
November 18, 2013

DUNNEGAN & SCILEPPI LLC

By 

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Attorneys for Plaintiffs

Pearson Education, Inc.,

John Wiley & Sons, Inc.,

Cengage Learning, Inc. and

McGraw-Hill Global Education

Holdings, LLC

350 Fifth Avenue

New York, New York 10118

(212) 332-8300

Schedule A
 "Pearson Copyrights"

Title, Author (Edition) (Registration Date) (Registration Number)

1. Linear Algebra and Its Applications, David C. Lay (4th Edition) (April 26, 2011) (TX0007365540)
2. Auditing and Assurance Services, Alvin A. Arens (14th Edition) (June 22, 2011) (TX0007387012)
3. Basic Business Statistics, Mark L. Berenson (12th Edition) (March 3, 2011) (TX0007341024)
4. Concepts in Strategic Management and Business Policy, Thomas L. Wheelen (13th Edition) (April 17, 2012) (TX0007522497)
5. Cost Accounting, Charles T. Horngren (14th Edition) (February 28, 2011) (TX0007335836)
6. International Economics, Paul R. Krugman (9th Edition) (May 25, 2011) (TX0007379727)
7. Marketing Management, Philip Kotler (14th Edition) (March 16, 2011) (TX0007341042)
8. Organizational Behavior, Stephen P. Robbins (15th Edition) (March 29, 2012) (TX0007507604)
9. Principles of Economics, Karl E. Case (10th Edition) (May 25, 2011) (TX0007378482)
10. Educational Research: Planning, Conducting, and Evaluating Quantitative and Qualitative Research, John W. Creswell (4th Edition) (April 5, 2011) (TX0007357790)
11. College Algebra in Context, Ronald J. Harshbarger (4th Edition) (April 5, 2012) (TX0007553847)
12. College Algebra: Graphs and Models, Marvin L. Bittinger (5th Edition) (April 30, 2012) (TX0007530765)
13. Probability and Statistics, Morris H. DeGroot (4th Edition) (December 23, 2010) (TX0007301856)
14. Vector Calculus, Susan J. Colley (4th Edition) (April 4, 2012) (TX0007525344)
15. Abnormal Psychology, Thomas F. Oltmanns (7th Edition) (October 28, 2011) (TX0007441515)
16. Psychology, Sandra K. Ciccarelli (3rd Edition) (February 22, 2011) (TX0007328614)
17. Psychology: Core Concepts, Philip G. Zimbardo (7th Edition) (December 15, 2011) (TX0007464158)
18. Social Psychology, Robert A. Baron (13th Edition) (December 12, 2011) (TX0007462032)
19. Statistics for Psychology, Arthur Aron Ph.D. (6th Edition) (August 30, 2012) (TX0007585119)
20. Campbell Biology, Jane B. Reece (9th Edition) (December 22, 2010) (TX0007304625)

21. Campbell Biology: Concepts & Connections, Jane B. Reece (7th Edition) (March 16, 2011) (TX0007335537)
22. Chemistry: The Central Science, Theodore E. Brown (12th Edition) (February 22, 2011) (TX0007328609)
23. Computer Science: An Overview, J. Glenn Brookshear (11th Edition) (March 15, 2011) (TX0007337417)
24. Fundamentals of Anatomy & Physiology, Frederic H. Martini (9th Edition) (March 8, 2011) (TX0007351970)
25. Fundamentals of General, Organic, and Biological Chemistry, John E. McMurry (6th Edition) (December 17, 2009) (TX0007120274)
26. Human Anatomy & Physiology, Elaine N. Marieb (9th Edition) (March 20, 2012) (TX0007509831)
27. Microbiology: An Introduction, Gerald J. Tortora (11th Edition) (March 29, 2012) (TX0007509406)
28. Organic Chemistry, Leroy G. Wade (8th Edition) (April 16, 2012) (TX0007528456)
29. Probability and Statistics, Morris H. DeGroot (4th Edition) (December 23, 2010) (TX0007301856)
30. Statistics for the Life Science, Myra L. Samuels (4th Edition) (February 7, 2011) (TX0007316292)

Schedule B
"Wiley Copyrights"

Title,	Author	(Edition)	(Registration Date)	(Registration Number)
1.	Abnormal Psychology,	Ann Kring	(12 th Edition) (March 19, 2012)	(TX0007501559)
2.	Accounting Information Systems: Controls and Processes,	Leslie Turner	(1 st Edition) (May 11, 2009)	(TX-6-997-785)
3.	Accounting Principles,	Jerry Weygandt	(8 th Edition) (December 20, 2007)	(TX0006954905)
4.	Accounting Principles,	Jerry Weygandt	(9 th Edition) (April 16, 2010)	(TX0007192054)
5.	Analytic Trigonometry with Applications,	Raymond Barnett	(11 th Edition) (January 19, 2012)	(TX0007476170)
6.	Applied Calculus,	Deborah Hughes-Hallett	(4 th Edition) (June 16, 2012)	(TX0007190610)
7.	Calculus: Early Transcendentals: Single Variable,	Howard Anton	(8 th Edition) (March 23, 2005)	(TX0006139880)
8.	Calculus: Single and Multivariable,	Deborah Hughes-Hallett	(6 th Edition) (November 28, 2012)	(TX0007636030)
9.	Calculus: Single Variable,	Deborah Hughes-Hallett	(5 th Edition) (July 15, 2011)	(TX0007401178)
10.	Cell and Molecular Biology: Concepts and Experiments,	Gerald Karp	(7 th Edition) (February 19, 2013)	(TX0007680568)
11.	Financial Accounting,	Jerry Weygandt	(7 th Edition) (November 24, 2010)	(TX0007303554)
12.	Financial Accounting in an Economic Context,	Jamie Pratt	(7 th Edition) (April 26, 2010)	(TX0007173453)
13.	Financial Accounting: Tools for Business Decision Making,	Paul Kimmel	(5 th Edition) (April 15, 2010)	(TX0007166080)
14.	Fundamentals of Biochemistry: Life at the Molecular Level,	Donald Voet	(4 th Edition) (February 16, 2012)	(TX0007497729)
15.	Fundamentals of Heat and Mass Transfer (5 th Edition) & Introduction to Heat Transfer (4 th Edition) Solutions Manual CD-ROM,	Frank Incropera	(January 21, 2005)	(TX0006091403)
16.	Fundamentals of Physics: Instructor's Solutions Manual Volume 1,	David Halliday	(7 th Edition) (January 21, 2005)	(TX0006101287)
17.	Fundamentals of Physics: Instructor's Solutions Manual Volume 2,	David Halliday	(7 th Edition) (January 21, 2005)	(TX0006101286)
18.	Intermediate Accounting,	Donald Kieso	(13 th Edition) (September 10, 2009)	(TX0007044357)
19.	Intermediate Accounting,	Donald Kieso	(15 th Edition) (March 22, 2013)	(TX0007688829)

20. Managerial Accounting: Tools for Business Decision Making, Jerry Weygandt (5th Edition) (November 19, 2010) (TX0007311538)
21. Physics, John Cutnell (9th Edition) (February 16, 2012) (TX7489114)
22. Statistics: Principles and Methods, Richard Johnson (4th Edition) (September 18, 2000) (TX0005280562)
23. Trigonometry, Cynthia Young (3rd Edition) (November 29, 2011) (TX0007456439)

Schedule C
 "Cengage Copyrights"

Title,	Author (Edition)	(Registration Date)	(Registration Number)
1.	Business Law and the Legal Environment, Beatty	(6 th Edition) (January 24, 2012)	(TX0007480576)
2.	Essentials of Economics, Mankiw	(6 th Edition) (May 16, 2011)	(TX0007375477)
3.	Financial Management: Theory & Practice, Brigham/Ehrhardt	(13 th Edition) (July 22, 2001)	(TX0007401325)
4.	Nutrition: Concepts and Controversies,Sizer/Whitney	(13 th Edition) (May 03, 2013)	(TX0007719051)
5.	Calculus: Early Transcendentals, Stewart	(7 th Edition) (July 15, 2011)	(TX0007403622)
6.	Calculus: Early Transcendental Functions, Larson/Edwards	(5 th Edition) (August, 18, 2011)	(TX0007412921)
7.	Organic Chemistry, McMurry	(8 th Edition) (March 7, 2011)	(TX0007335084)
8.	Sociology: The Essentials, Andersen/Taylor	(7 th Edition) (January 12, 2012)	(TX0007473664)
9.	Probability and Statistics for Engineering and the Sciences, Devore	(8 th Edition) (August 8 th 2011)	(TX0007408194)
10.	Principles of Physics: A Calculus-Based Text, Serway/Jewett	(5 th Edition) (February 15, 2012)	(TX0007507602)
11.	Instructor's Resource Manual, Chemistry and Chemical Reactivity, Kotz/Treichel/Townsend	(7 th Edition) (August 19, 2008)	(TX0006874925)
12.	Instructor's Resource Manual, Biology: The Unity and Diversity of Life, Starr/Taggart/Evers	(12 th Edition) (September 9, 2009)	(TX0006880278)
13.	Test Bank for Foundations of Business, Pride/Hughes/Kapoor	(2 nd Edition) (January 14, 2011)	(TX0007312523)

Schedule D
"MHE Copyrights"

Title,	Author	(Edition)	(Registration Date)	(Registration Number)
1.	Managerial Accounting, Garrison	(14 th Edition)	(September 21, 2012)	(TX0007578478)
2.	Child Development: An Introduction, Santrock	(13 th Edition)	(December 17, 2012)	(TX0007628107)
3.	College Accounting, Instructor Manual, Price/Haddock/Farina	(12 th Edition)	(June 9, 2010)	(TX0007198222)
4.	College Accounting, Instructor's Edition: Chapter 1-30, Price/Haddock/Farina	(12 th Edition)	(July 12, 2010)	(TX0007210386)
5.	Concepts in Biology, Enger/Ross/Bailey	(14 th Edition)	(December 14, 2012)	(TX0007660826)
6.	Corporate Finance: Core Principles and Applications, Ross	(3 rd Edition)	(October 12, 2010)	(TX0007285595)
7.	Educational Psychology, John Santrock	(5 th Edition)	(September 21, 2012)	(TX0007578492)
8.	Financial Accounting, Libby/Libby/Short	(7 th Edition)	(July, 25, 2011)	(TX0007407681)
9.	Foundations in Microbiology, Kathleen Park	(8 th Edition)	(Copyright Application Filed, Copyright Registration Pending)	
10.	Intermediate Accounting, Spiceland	(7 th Edition)	(July 09, 2012)	(TX0007563743)
11.	International Management: Culture, Strategy, and Behavior, Luthans	(8 th Edition)	(December 04, 2012)	(TX0007639464)
12.	Money, Banking and Financial Markets Instructor Manual, Cecchetti	(2 nd Edition)	(September 19, 2007)	(TX0006830600) (repeating ISM)
13.	Organizations: Behavior, Structure, Processes, Gibson	(14 th Edition)	(December 04, 2012)	(TX0007639467)

Schedule E
 "Pearson Trademarks"

<u>U.S. Trademark</u>	<u>Registration Number</u>	<u>Class</u>
1. "Pearson"	2,599,724	009, 016, 035, 042
2. "Pearson"	2,600,081	041
3. "Pearson"	2,652,792	009, 016
4. "Pearson"	2,679,355	016
5. "Pearson"	2,691,830	041
6. "Pearson"	2,694,359	009
7. "Prentice-Hall"	1,332,044	016
8. "Prentice-Hall"	1,332,639	042
9. "Prentice-Hall"	1,375,654	009
10. "Addison Wesley"	2,188,798	016
11. "Addison-Wesley"	2,400,130	016
12. "Benjamin Cummings"	2,674,589	016
13. "Benjamin Cummings"	2,671,773	041
14. "Benjamin Cummings"	2,671,772	041
15. "Benjamin Cummings"	2,621,299	016
16. "Benjamin Cummings"	1,189,279	016

Schedule F
"Wiley Trademarks"

	<u>U.S. Trademark</u>	<u>Registration Number</u>	<u>Class</u>
1.	"JW" Colophon	2,168,941	009, 042
2.	"Wiley"	1,003,988	009, 016, 036, 038
3.	"Wiley"	2,159,987	009, 042

Schedule G
"Cengage Trademarks"

	<u>U.S. Trademark</u>	<u>Registration Number</u>	<u>Class</u>
1.	"Cengage"	3,603,349	009, 016, 041
2.	"Cengage Learning"	3,603,376	009, 016, 041

Schedule H
"MHE Trademarks"

	<u>U.S. Trademark</u>	<u>Registration Number</u>	<u>Class</u>
1.	"McGraw-Hill Irwin"	3,316,962	9, 16
2.	"McGraw-Hill Irwin"	3,316,236	9, 16
3.	"McGraw-Hill Connect"	3,988,680	38, 41
4.	"Irwin"	1,718,118	16